JOHN S. KIERNAN DEBEVOISE & PLIMPTON LLP 919 Third Avenue New York, New York 10022

Attorneys for Federal Reserve Bank of New York

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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STARR INTERNATIONAL COMPANY, INC., INDIVIDUALLY AND DERIVATIVELY ON BEHALF OF AMERICAN INTERNATIONAL

GROUP, INC., : 11 Civ. 8422 (PAE)

Plaintiff,

: ECF Case

X

AMENDED COMPLAINT

-against-

: NOTICE OF DEFENDANT'S FEDERAL RESERVE BANK OF NEW YORK, : MOTION TO DISMISS THE

Defendant,

iendant,

and AMERICAN INTERNATIONAL GROUP, INC., a Delaware corporation,

Delaware corporation,

Nominal Defendant. :

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and declaration of John S. Kiernan, executed on April 2, 2012, and upon all prior pleadings and proceedings herein, the undersigned, attorneys for Defendant Federal Reserve Bank of New York, hereby move this Court for an order dismissing Plaintiff's amended complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction of the purported takings claims, 12(b)(6) for failure to state a claim upon which relief can be granted, and 23.1(b)(3) for failure to plead with

particularity that the requirements to maintain a derivative action were met, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York

April 2, 2012

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

Of Counsel:

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By: /s/ John S. Kiernan
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